

# Court Exhibit F: Notice of Intent to Sue [without Notice of Legal Claims (already inclu. in Complaint as Cout Ex. D)]

TAMAH JADA CLARK



Anré Williams, CEO & National Director  
American Express National Bank  
4315 S 2700 W  
Salt Lake City, Utah 8418

*Sent via FedEx® 2-Day Shipping*

Tuesday, March 4, 2025

**RE: Notice of Intent to Sue**  
**For Violation of State and Federal Banking and Criminal Laws**  
*(In Connection with Platinum Card Ending in -08007)*

Dear Mr. Williams,

I would like to formally make you aware that state and federal banking and criminal laws have been and are being violated at American Express National Bank in connection with my Platinum Card® Account ending in -08007. Please see attached *Notice of Legal Claims (Civil and Criminal) & Demand for Relief for Platinum Card Ending in -08007* dated February 28, 2025.

Per your Oath as CEO/National Director of American Express National Bank,<sup>1</sup> you are required to swear an oath to diligently and honestly administer the affairs of the bank,<sup>2</sup> and to

---

<sup>1</sup>“ Pursuant to 12 U.S.C. 76, the person serving as, or in the function of, president of a national bank, regardless of title, must be a member of the board of directors. A director other than the person serving as, or in the function of, president may be elected chairman of the board.” CFR 12 § 7.2012.

<sup>2</sup> “The business and affairs of a national bank must be managed by or under the direction of the board of directors. The board of directors should refer to OCC published guidance for additional information regarding responsibilities of directors.” CFR 12 § 7.2010.

not knowingly violate, or willingly permit to be violated any applicable statute or regulation pursuant 12 U.S.C. § 73<sup>3</sup> and CFR 12 § 7.2008(b).<sup>4</sup>

Allowing Jennifer Fell and Mia Figueroa from the American Express General Counsel's Office to vindictively close my account in retaliation against me for requesting that American Express comply with federal law is a violation of your Oath. Please see attached emails dated March 3, 2025, and March 4, 2025. Thank you.

Sincerely,

/s/ Tamah Jada Clark  
TAMAH JADA CLARK

CC:

Stephen J. Squeri  
Chairman And Chief Executive Officer  
200 Vesey Street  
New York, NY 10285

Laureen E. Seeger, Chief Legal Officer  
American Express Executive Committee  
200 Vesey Street  
New York, NY 10285

American Express Company  
c/o CT Corporation System  
1108 E South Union Ave  
Midvale, UT, 84047

Jennifer Fell  
[Jennifer.Fell@aexp.com](mailto:Jennifer.Fell@aexp.com)  
American Express  
Global Litigation & Investigations Team  
General Counsel's Organization

Mia Figueroa  
[Mia.Figueroa@aep.com](mailto:Mia.Figueroa@aep.com)  
American Express  
Global Litigation & Investigations Team  
General Counsel's Organization

---

<sup>3</sup>" Each director, when appointed or elected, shall take an oath that he will, so far as the duty devolves on him, diligently and honestly administer the affairs of such association, and will not knowingly violate or willingly permit to be violated any of the provisions of title 62 of the Revised Statutes". 12 U.S.C. § 73.

<sup>4</sup> "Each national bank director must execute either a joint or individual oath at the first meeting of the board of directors that the director attends after the director is appointed or elected. A national bank director must take another oath upon re-election, notwithstanding uninterrupted service. Appropriate sample oaths may be found in the Charter Booklet of the Comptroller's Licensing Manual available at www.occ.gov." CFR 12 § 7.2008(b).

## Emails Dated March 3, 2025 and March 4, 2025

Re: Notice of Legal Claims (Civil and Criminal)

From: Tamah Clark (tamahjclark@yahoo.com)

To: jennifer.fell@aexp.com; mia.figueroa@aexp.com

Date: Monday, March 3, 2025 at 07:12 PM EST

Dear American Express,

On 03/03/2025, I called 1(800) 639-1202 at 5:40 PM ET to request information about who cancelled my account 02/26/2025 and why, in order to know what steps need to be taken to re-open it.

I was told the account was closed by the Credit Department/Account Services (Credit Team), according to a Card Services team member (Keisha) at 5:45 PM ET on 03/03/2025, who said she **does not see any notes** about why the account was cancelled. She placed me on hold at 5:46 PM ET (03/03/2025) to get me conferenced in with that Department (i.e. Credit Department/Account Services). I held for 10 minutes, then at 5:56 PM, reached "Mailbox#:1199012" and left a message.

In the message, I left my name, phone number, last five digits of my card number and said what Keisha told me (Credit Department the closed account, but there were no notes), and requested my account be re-opened and the \$25 account re-opening fee (required according to the Platinum Card® Membership Agreement, p. 2) be waived because the account was closed in error.

As can be seen in the screenshot below, **my credit was "very good" as of the day my account was cancelled (02/26/2025) according to American Express** and *there have been no changes to my credit score*, which makes the situation all the more "interesting". Clearly, there has been some sort of error that has taken place. I am hoping it is rectified as soon as possible, because **I do intend to contact American Express National Bank Director, Anré Williams, THIS WEEK, if no progress is made in this very important, very time-sensitive matter.** Thank you.

AMERICAN EXPRESS

My Account

Cards

Banking

Travel

Rewards & Benefits

Business

Customer Service

Log Out

MyCredit Guide

Dashboard

Credit Report

Offers

Resources

21

Welcome, TAMAH

You have 21 new alert(s)

Experian

As of 2/26/2025

SCORE INGREDIENTS

Payment History

Very Good

Very Good

300

FICO SCORE 8

850

Score change

0 pts

Last updated

6 days ago

Set your target credit score.

Set goal now

What types of credit you're ...

Alerts

Credit Report

Your latest credit report is available.

There is a new inquiry on your credit report

Someone recently checked your credit.

There is a new inquiry on your credit report

Someone recently checked your credit.

See all alerts

Get More #withAmex

Check out all the ways you can expand your Card Membership

View Offers

AMERICAN EXPRESS

REWARDS

SCENARIOS

On Friday, February 28, 2025 at 04:52:01 PM EST, Tamah Clark <tamahjclark@yahoo.com> wrote:

Please see attached Legal Notice. Thank you.

## Re: Claim Notice for Platinum Card / Confidential Settlement Communication

From: Tamah Clark (tamahjclark@yahoo.com)  
To: jennifer.fell@aexp.com  
Cc: mia.figueroa@aexp.com  
Date: Tuesday, March 4, 2025 at 03:13 PM EST

Good Afternoon,

After speaking with the Amex Credit Department/Account Services today at 1:50 PM at 1(800) 249-2685, the Account's closure has only become more suspicious. Miria, the supervisor who called me today at 12:48 PM, was unavailable and Michelle (her subordinate) could not tell me why or when she would be.

Michelle stated my account was not closed due to my credit but because a different, unidentified "higher up" department gave them a list with the Account on it stating to close it due to Bank regulatory guidelines and polices-- which I am 100% certain is false. I have copies of and have reviewed all applicable regulatory guidelines and I know for a fact that I have not violated any regulatory guidelines at any point in time. I have lost my patience with getting the "run-around" from a major financial institution that should easily be able to provide answers.

Unfortunately, I am unable to continue going back and forth without meaningful progress when my credit and financial portfolio are on the line as a result of this no-fault closure. We can easily find out what happened via subpoenas and discovery.

I will be contacting the Bank Director immediately and making him aware that American Express was given the opportunity to do the right thing but has chosen to resolve this via legal processes due to unfair, deceptive, and abuses practices. Thank you.

On Tuesday, March 4, 2025 at 11:54:19 AM EST, Jennifer Fell <jennifer.fell@aexp.com> wrote:

Good afternoon Ms. Clark,

Please allow this to serve as a response to your recent email correspondence to our team dated February 26, 2025 and March 3, 2025 in connection with the cancellation of the Platinum Account ending in #08007 (the "Account").

After review, please be advised that our team, who was handling your Claim Notice in connection with the disputed AirBNB charge of \$5,597.73, was not involved with or made aware of the cancellation of the Account.

Should you have any questions regarding the account cancellation, please call American Express at 1-800-249-2583 and you will be directed to the appropriate team who can assist you.

Cordially,

Jennifer

JENNIFER FELL (SHE/HER) | DIRECTOR & LITIGATION COUNSEL

GLOBAL LITIGATION & INVESTIGATIONS TEAM

GENERAL COUNSEL'S ORGANIZATION

AMERICAN EXPRESS, COLLEAGUE SINCE '16

E: [jennifer.fell@aexp.com](mailto:jennifer.fell@aexp.com)

---

**From:** Jennifer Fell

**Sent:** Saturday, March 1, 2025 12:54 PM

**To:** TJClark <[tamahjclark@yahoo.com](mailto:tamahjclark@yahoo.com)>

**Cc:** Mia Figueroa <[Mia.Figueroa@aexp.com](mailto:Mia.Figueroa@aexp.com)>

**Subject:** RE: Claim Notice for Platinum Card / Confidential Settlement Communication

Dear Ms. Clark,

Thank you for your recent email and correspondence to American Express. As an update, American Express is reviewing your correspondence and will revert back.

Cordially,

Jennifer



Re: Notice of Legal Claims (Civil and Criminal)

---

From: Tamah Clark (tamahjclark@yahoo.com)

To: jennifer.fell@aexp.com; mia.figueroa@aexp.com

Date: Tuesday, March 4, 2025 at 05:24 PM EST

---

Dear American Express,

Today I spoke with Miria in Credit Department/Account Services. She stated that she cannot provide any answers about why my Account was closed, but that I would need to write to the American Express General Counsel's Office at 200 Vesey Street, 49th Floor, Mail Drop NY-01-50-01, New York. This confirms who is responsible for my account being closed.

I was attempting to avoid American Express incurring exorbitant fees from bank regulators, but after I file my lawsuit this week, the situation will be completely out of my hands. I tried calling the Bank Director but the number listed with the Utah Department of Financial Services (1-800-528-2122) led me to Platinum Card Member Services.

I was going to write him a Notice of Intent to Sue, but at this point it will be best to just sue. Because Miria told me the account will be reported on my credit as "closed at lender's request/closed by lender" which is defamatory and would negatively affect my accounts with other financial institutions as well as interfere with third-party business relations because it makes it appear as though I have done something wrong.

The lawsuit will be filed this week and legal service will be perfected upon the appropriate parties by next week. Thank you.

On Monday, March 3, 2025 at 07:12:24 PM EST, Tamah Clark <tamahjclark@yahoo.com> wrote:

Dear American Express,

On 03/03/2025, I called 1(800) 639-1202 at 5:40 PM ET to request information about who cancelled my account 02/26/2025 and why, in order to know what steps need to be taken to re-open it.

I was told the account was closed by the Credit Department/Account Services (Credit Team), according to a Card Services team member (Keisha) at 5:45 PM ET on 03/03/2025, who said she